

## TIME AND EXPENSES IN CROSS

Date	Activity	Time (.1)
------	----------	-----------

**Discovery**

2/24/2022	telephone call from McKinley	.7
2/24/2022	e-mail from McKinley	.1
2/24/2022	read and reviewed complaint	.2
2/25/2022	e-mail to McKinley	.1
2/27/2022	e-mail to McKinley	.2
2/28/2022	e-mail from McKinley	.1
2/28/2022	e-mail to McKinley	.1
3/1/2022	e-mail from McKinley	.1
3/2/2022	e-mail to McKinley	.1
3/2/2022	e-mail from McKinley	.1
3/2/2022	e-mail to McKinley	.1
3/2/2022	e-mail from McKinley	.1
3/3/2022	telephone call to McKinley	1.3
3/3/2022	e-mail from McKinley	.1
3/3/2022	e-mail from McKinley	.1
3/3/2022	e-mail from McKinley	.1
3/3/2022	e-mail from McKinley	.1
3/4/2022	drafting entry of appearance	.1
3/4/2022	e-mail to McKinley	.1
3/4/2022	e-mail from McKinley	.1
3/4/2022	e-mail from McKinley	.1
3/4/2022	e-mail from McKinley	.1
3/4/2022	telephone call from McKinley	.4
3/4/2022	e-mail to McKinley	.1
3/4/2022	e-mail from McKinley	.1
3/4/2022	e-mail from McKinley	.1

3/6/2022	e-mail from client	.1
3/7/2022	zoom conference with client	.2
3/7/2022	telephone call from McKinley	.2
3/8/2022	e-mail from McKinley	.1
3/9/2022	telephone call from McKinley	.2
3/10/2022	e-mail from McKinley	.1
3/21/2022	e-mail from Dangerfield	.1
3/22/2022	e-mail from Dangerfield	.1
3/22/2022	telephone call to Holly Dangerfield	.1
3/22/2022	e-mail from McKinley	.1
3/22/2022	e-mail from McKinley	.1
3/22/2022	e-mail from McKinley	.1
3/23/2022	e-mail from McKinley	.1
3/23/2022	e-mail to McKinley	.1
3/23/2022	telephone call from McKinley	1.0
3/24/2022	drafting new discovery requests	.4
3/24/2022	e-mail to McKinley	.1
4/1/2022	e-mail from Mckinley	.1
4/4/2022	e-mail to McKinley	.1
4/4/2022	telephone call to McKinley	.9
4/7/2022	e-mail from McKinley	.1
4/7/2022	e-mail from McKinley	.1
4/7/2022	e-mail from client	.1
4/8/2022	e-mail from McKinley	.1
4/8/2022	e-mail from McKinley	.1
4/12/2022	zoom conference with McKinley and client	1.5
4/12/2022	telephone call from McKinley	.5
4/12/2022	e-mail from McKinley	.1
4/12/2022	e-mail from McKinley	.1

4/12/2022	drafting notice of change of address	.1
4/18/2022	e-mail from McKinley	.1
4/18/2022	e-mail from McKinley	.1
4/18/2022	e-mail to McKinley	.1
4/18/2022	read and reviewed order transferring case to new Magistrate	.1
4/19/2022	telephone call from McKinley	.1
4/22/2022	e-mail to McKinley	.1
4/22/2022	e-mail from McKinley	.1
4/23/2022	telephone call to McKinley	.2
4/25/2022	telephone call to Barbara Crossley	.1
4/25/2022	e-mail to Judge Schmehl's chambers	.1
4/26/2022	e-mail from McKinley	.1
4/26/2022	e-mail to McKinley	.1
4/26/2022	e-mail from McKinley	.1
4/26/2022	e-mail to McKinley	.1
4/26/2022	e-mail to McKinley	.1
4/26/2022	e-mail from McKinley	.1
4/26/2022	e-mail from McKinley	.1
4/26/2022	e-mail from Thomas Stewart	.1
4/27/2022	e-mail from McKinley	.1
4/27/2022	e-mail from Glenn Richardson	.1
4/27/2022	e-mail from Judge Schmehl's chambers	.1
4/27/2022	read and reviewed order setting discovery conference	.1
4/28/2022	telephone call to McKinley	.4
5/2/2022	e-mail from Jason Lanter	.1
5/4/2022	e-mail from Le	.1
5/4/2022	e-mail from McKinley	.1
5/4/2022	read and reviewed Def. responses to first RPDs	.1
5/4/2022	telephone call to McKinley	.1

5/4/2022	discovery phone conference with the Court	.5
5/4/2022	telephone call to McKinley	.3
5/5/2022	e-mail from McKinley	.1
5/10/2022	e-mail from Le	.1
5/16/2022	e-mail to Le	.1
5/16/2022	e-mail from McKinley	.1
5/16/2022	telephone call to McKinley	.3
5/16/2022	e-mail from Le	.1
5/16/2022	e-mail from McKinley	.1
5/16/2022	e-mail from McKinley	.1
5/16/2022	e-mail from Le	.1
5/20/2022	preparing for meeting with McKinley	.5
5/20/2022	meeting with McKinley	2.5
5/20/2022	travel to and from meeting with McKinley (2.9 / 2)	1.4
5/20/2022	status conference with the Court	.1
5/20/2022	e-mail from Le	.1
5/20/2022	e-mail from Le	.1
5/20/2022	e-mail from McKinley	.1
5/20/2022	e-mail from Le	.1
5/23/2022	e-mail to McKinley	.1
5/23/2022	read and reviewed order setting status conference	.1
5/23/2022	read and reviewed client's facebook page	.2
5/24/2022	e-mail to Le	.1
5/24/2022	downloading and preparing Steve Oross' facebook pages as of 10/14	1.1
5/24/2022	e-mail to McKinley	.1
5/25/2022	e-mail from McKinley	.1
5/25/2022	e-mail to McKinley	.1
5/25/2022	e-mail from McKinley	.1
5/25/2022	e-mail from McKinley	.1

5/26/2022	e-mail to Le	.1
5/26/2022	e-mail from Le	.1
5/26/2022	e-mail from Le	.1
5/27/2022	e-mail from Le	.1
6/1/2022	e-mail from McKinley	.1
6/1/2022	e-mail from McKinley	.1
6/2/2022	e-mail from Le	.1
6/3/2022	e-mail to Le	.1
6/3/2022	e-mail from McKinley	.1
6/3/2022	e-mail from McKinley	.1
6/6/2022	e-mail to Le	.1
6/7/2022	e-mail from Le	.1
6/7/2022	e-mail to McKinley	.1
6/7/2022	e-mail from McKinley	.1
6/7/2022	e-mail from McKinley	.1
6/7/2022	e-mail from Le	.1
6/7/2022	read and reviewed defendant's responses to second RPD's	.1
6/7/2022	e-mail to Le	.1
6/7/2022	e-mail to Mckinley	.1
6/7/2022	e-mail from Le	.1
6/7/2022	e-mail from Le	.1
6/8/2022	read and reviewed order resetting conference call	.1
6/8/2022	e-mail to client	.1
6/8/2022	e-mail from client	.1
6/14/2022	e-mail from Le	.1
6/14/2022	e-mail from McKinley	.1
6/14/2022	e-mail from McKinley	.1
6/15/2022	e-mail from McKinley	.1
6/15/2022	e-mail from McKinley	.1

6/16/2022	e-mail from Le	.1
6/15/2022	e-mail from McKinley	.1
6/15/2022	e-mail from McKinley	.1
6/16/2022	e-mail to McKinley	.1
6/16/2022	e-mail from McKinley	.1
6/16/2022	telephone call to McKinley	.6
6/16/2022	e-mail from McKinley	.1
6/16/2022	e-mail from McKinley	.1
6/17/2022	e-mail from Le	.1
6/17/2022	e-mail from Le	.1
6/17/2022	e-mail from Le	.1
6/17/2022	e-mail to client	.1
6/17/2022	e-mail from McKinley	.1
6/17/2022	examining legal authority re attorney client privilege associated with training documents	.2
6/17/2022	telephone call from McKinley	.2
6/17/2022	telephone call from McKinley	.5
6/17/2022	e-mail from Le	.1
6/17/2022	e-mail from McKinley	.1
6/17/2022	e-mail from Le	.1
6/20/2022	e-mail to McKinley	.1
6/20/2022	e-mail from McKinley	.1
6/20/2022	e-mail to Le	.1
6/20/2022	e-mail to McKinley	.1
6/20/2022	e-mail from McKinley	.1
6/20/2022	e-mail to McKinley	.1
6/21/2022	letter to Le re discovery dispute	.6
6/21/2022	e-mail from Le	.1
6/21/2022	examining further legal authority re attorney client privilege associated	

	with training documents	.1
6/21/2022	e-mail from McKinley	.1
6/21/2022	e-mail to McKinley	.1
6/21/2022	e-mail from McKinley	.1
6/21/2022	examining legal authority re injunctive relief against state	.2
6/21/2022	e-mail to McKinley	.1
6/21/2022	read and reviewed Hawkinson deposition in Lucabeche case	.2
6/21/2022	e-mail from McKinley	.1
6/22/2022	conference call with client and McKinley	2.0
6/22/2022	e-mail from McKinley	.1
6/22/2022	e-mail to Le	.1
6/22/2022	e-mail from Le	.1
6/23/2022	e-mail to Le	.1
6/23/2022	telephone call with McKinley	.5
6/24/2022	e-mail from Le	.1
6/27/2022	status conference with Court	.4
6/27/2022	telephone call from McKinley	.2
6/27/2022	e-mail from McKinley	.1
6/27/2022	e-mail from McKinley	.1
6/27/2022	e-mail to McKinley	.1
6/27/2022	e-mail from McKinley	.1
6/27/2022	e-mail from McKinley	.1
6/27/2022	e-mail to McKinley	.1
6/27/2022	telephone call to McKinley	.5
6/28/2022	e-mail to McKinley	.1
6/28/2022	e-mail from Le	.1
6/28/2022	e-mail from McKinley	.1
6/28/2022	telephone call from McKinley	.2
6/28/2022	e-mail from McKinley	.1

6/28/2022	e-mail from McKinley	.1
6/28/2022	e-mail from McKinley	.1
6/28/2022	e-mail from McKinley	.1
6/28/2022	e-mail from McKinley	.1
6/29/2022	e-mail from court reporter	.1
6/29/2022	e-mail from Le	.1
6/29/2022	e-mail to le	.1
6/29/2022	e-mail from McKinley	.1
6/29/2022	e-mail to Le	.1
6/29/2022	preparing questions for Hawkinson	.2
6/29/2022	telephone call from McKinley	.8
6/29/2022	e-mail from McKinley	.1
6/29/2022	e-mail from McKinley	.1
6/29/2022	e-mail to McKinley	.1
6/29/2022	e-mail from McKinley	.1
6/29/2022	e-mail from McKinley	.1
6/29/2022	e-mail from client	.1
6/29/2022	e-mail from McKinley	.1
6/29/2022	e-mail from Le	.1
6/29/2022	e-mail from McKinley	.1
6/29/2022	e-mail from McKinley	.1
6/29/2022	e-mail from McKinley	.1
6/29/2022	e-mail from McKinley	.1
6/30/2022	e-mail from Le	.1
6/30/2022	reviewed authority from Le re privilege assertion	.1
6/30/2022	deposition of Hawkinson	6.5
6/30/2022	telephone call from McKinley	.1
6/30/2022	telephone call from McKinley	.2
6/30/2022	telephone call from McKinley	.1
6/30/2022	telephone call from McKinley	.1



6/30/2022	telephone call from McKinley	.2
7/1/2022	e-mail from McKinley	.1
7/6/2022	e-read and reviewed order setting conference	.1
7/7/2022	e-mail from McKinley	.1
7/7/2022	e-mail to Le	.1
7/7/2022	e-telephone call from McKinley	.8
7/7/2022	e-mail from client	.1
7/8/2022	e-mail from Le	.1
7/8/2022	e-mail to Le	.1
7/8/2022	e-mail from Le	.1
7/11/2022	e-mail from Le	.1
7/12/2022	e-mail to client	.1
7/12/2022	telephone call from client	.5
7/12/2022	e-mail to Judge Schmehl	.1
7/12/2022	read and reviewed order from the Court re conference to resolve discovery dispute	.1
7/13/2022	telephone call from McKinley	.2
7/14/2022	preparing for discovery conference with the Court	.2
7/14/2022	conference with the Court re discovery dispute	.4
7/14/2022	read and reviewed order extending discovery and setting conference for 7/25	.1
7/18/2022	e-mail from McKinley	.1
7/19/2022	telephone call from McKinley	.7
7/19/2022	drafting e-mail to court re discovery dispute	.5
7/19/2022	drafting questions for mock trial jurors	.2
7/19/2022	e-mail to McKinley	.1
7/19/2022	e-mail to McKinley	.1
7/19/2022	e-mail to Chambers	.1
7/19/2022	e-mail from McKinley	.1

7/19/2022	e-mail from McKinley	.1
7/19/2022	e-mail from Le	.1
7/19/2022	e-mail from Le	.1
7/19/2022	e-mail from Le	.1
7/20/2022	e-mail to McKinley	.1
7/20/2022	e-mail to Judge Schmehl	.1
7/20/2022	e-mail to McKinley	.1
7/20/2022	e-mail from McKinley	.1
7/20/2022	e-mail to McKinley	.1
7/20/2022	e-mail from Judge Lloret's chambers	.1
7/20/2022	e-mail from McKinley	.1
7/20/2022	e-mail from McKinley	.1
7/20/2022	e-mail from McKinley	.1
7/20/2022	e-mail from McKinley	.1
7/21/2022	drafting focus group verdict slip	.6
7/21/2022	e-mail to McKinley	.1
7/21/2022	e-mail to McKinley	.1
7/21/2022	drafting juror questionnaire for focus group	.2
7/25/2022	e-mail from Le	.1
7/25/2022	e-mail from McKinley	.1
7/25/2022	e-mail to McKinley	.1
7/26/2022	read and reviewed order resetting Rule 56 deadline to October 14	.1
7/26/2022	telephone call from McKinley	.2
7/26/2022	e-mail from McKinley	.1
7/26/2022	e-mail from McKinley	.1
7/27/2022	e-mail from Le	.1
7/27/2022	e-mail from McKinley	.1
7/27/2022	e-mail from Le	.1
7/27/2022	e-mail from McKinley	.1

7/27/2022	e-mail from Le	.1
7/27/2022	e-mail from McKinley	.1
8/1/2022	read and reviewed order denying plaintiff's request for training documents	.1
8/1/2022	e-mail to McKinley	.1
8/2/2022	e-mail from McKinley	.1
8/2/2022	e-mail from McKinley	.1
8/2/2022	telephone call from McKinley	.5
8/2/2022	e-mail from McKinley	.1
8/3/2022	e-mail from Le	.1
8/3/2022	e-mail to Le	.1
8/3/2022	e-mail from McKinley	.1
8/3/2022	e-mail from McKinley	.1
8/3/2022	e-mail from McKinley	.1
8/3/2022	e-mail from McKinley	.1
8/3/2022	e-mail from McKinley	.1
8/3/2022	e-mail from McKinley	.1
8/4/2022	e-mail from client	.1
8/5/2022	e-mail from McKinley	.1
8/5/2022	e-mail from McKinley	.1
8/5/2022	e-mail from Le	.1
8/5/2022	e-mail from McKinley	.1
8/5/2022	e-mail from Le	.1
8/5/2022	e-mail from McKinley	.1
8/6/2022	e-mail to McKinley	.1
8/8/2022	e-mail from McKinley	.1
8/8/2022	e-mail to McKinley	.1
8/8/2022	e-mail from McKinley	.1
8/9/2022	e-mail from Le	.1
8/9/2022	e-mail from Le	.1

8/9/2022	e-mail from McKinley	.1
8/10/2022	e-mail from McKinley	.1
8/11/2022	e-mail from McKinley	.1
8/11/2022	e-mail from McKinley	.1
<hr/>		
Subtotal		60.6
<b>Focus Group</b>		
7/11/2022	telephone call to Stefanie Mensing	1.0
7/28/2022	e-mail to McKinley	.1
7/28/2022	e-mail to Mensing	.1
7/28/2022	e-mail from Mensing	.1
7/28/2022	e-mail from McKinley	.1
7/29/2022	e-mail to Mensing	.1
8/1/2022	telephone call to client	.5
8/5/2022	e-mail from Mensing	.1
8/11/2022	e-mail from Mensing	.1
8/11/2022	e-mail to Mensing	.1
8/12/2022	e-mail from Mensing	.1
8/12/2022	telephone call from Mensing	.3
8/14/2022	e-mail to McKinley	.1
8/14/2022	preparing for focus group (review of Weidman's deposition)	.6
8/15/2022	telephone call to McKinley	.9
8/15/2022	preparing for focus group (review of Weidman's deposition)	1.2
8/15/2022	preparing for focus group (review of Martin's deposition)	.5
8/15/2022	e-mail to McKinley	.1
8/19/2022	e-mail from Le	.1
8/19/2022	e-mail from Lloret's chambers	.1
8/19/2022	e-mail from Le	.1
8/20/2022	e-mail from McKinley	.1

8/19/2022	e-mail from McKinley	.1
8/19/2022	e-mail from McKinley	.1
8/19/2022	e-mail from McKinley	.1
8/19/2022	e-mail from McKinley	.1
8/19/2022	e-mail from client	.1
8/20/2022	e-mail from McKinley	.1
8/20/2022	drafting verdict slip for focus group	.3
8/20/2022	e-mail from McKinley	.1
8/20/2022	e-mail to McKinley	.1
8/20/2022	preparing for focus group (review of Pena's deposition)	1.0
8/20/2022	preparing for focus group (review of Hawkinson's deposition)	.6
8/21/2022	e-mail to McKinley	.1
8/21/2022	e-mail to McKinley	.1
8/21/2022	e-mail from McKinley	.1
8/21/2022	e-mail to McKinley	.1
8/22/2022	drafting jury instructions for focus group	1.3
8/22/2022	e-mail to McKinley	.1
8/22/2022	telephone call to McKinley	.7
8/22/2022	e-mail from McKinley	.1
8/22/2022	e-mail from McKinley	.1
8/23/2022	e-mail to McKinley	.1
8/23/2022	e-mail from McKinley	.1
8/23/2022	telephone call to McKinley	.1
8/23/2022	e-mail from Lloret's chambers	.1
8/23/2022	e-mail from McKinley	.1
8/23/2022	e-mail from McKinley	.1
8/23/2022	e-mail from client	.1
8/23/2022	e-mail to McKinley	.1
8/23/2022	e-mail from McKinley	.1

8/24/2022	telephone call from Mensing	.4
8/24/2022	e-mail from Mensing	.1
8/24/2022	e-mail from McKinley	.1
8/24/2022	e-mail from client	.1
8/24/2022	telephone call from McKinley	.1
8/24/2022	e-mail from client	.1
8/24/2022	telephone call from McKinley	.1
8/24/2022	telephone call to McKinley	.1
8/25/2022	e-mail from McKinley	.1
8/25/2022	e-mail from McKinley	.1
8/26/2022	e-mail from Mensing	.1
8/26/2022	e-mail to McKinley	.1
8/26/2022	e-mail from mensing	.1
8/26/2022	e-mail to Mensing	.1
8/27/2022	focus group and meeting with McKinley both before and after (travel time of 2.4 included and then divided by 2)	8.6
8/29/2022	telephone call to client	.2
9/12/2022	phone conference with Mensing	1.1

---

Subtotal	24.4
----------	------

**Settlement/Mediation**

8/29/2022	e-mail from McKinley	.1
8/29/2022	telephone call from McKinley	.2
9/2/2022	telephone call from McKinley	.6
9/2/2022	e-mail from McCurry	.1
9/2/2022	e-mail from McKinley	.1
9/2/2022	e-mail from McCurry	.1
9/2/2022	e-mail from client	.1
9/2/2022	e-mail from McKinley	.1

9/2/2022	e-mail from McKinley	.1
9/4/2022	e-mail from client	.1
9/5/2022	e-mail from McKinley	.1
9/5/2022	e-mail from McKinley	.1
9/5/2022	read and reviewed order	.1
9/5/2022	e-mail from McKinley	.1
9/5/2022	e-mail from McKinley	.1
9/5/2022	e-mail to McKinley	.1
9/5/2022	e-mail from McKinley	.1
9/6/2022	e-mail from McKinley	.1
9/12/2022	zoom conference with client	1.4
9/13/2022	mediation	2.8

---

Subtotal	6.6
----------	-----

#### Summary Judgment

9/6/2022	drafting motion for summary judgment on 1 <sup>st</sup> Amendment claims	2.0
9/8/2022	drafting motion for summary judgment on 1 <sup>st</sup> Amendment claims	1.1
9/10/2022	drafting motion for summary judgment on 1 <sup>st</sup> Amendment claims	2.7
9/26/2022	telephone call from McKinley	.1
9/26/2022	drafting motion for summary judgment on 1 <sup>st</sup> Amendment claims	.8
9/26/2022	telephone call to client	.1
9/27/2022	e-mail from McKinley	.1
9/27/2022	telephone call from McKinley	.1
9/27/2022	e-mail from McKinley	.1
9/27/2022	e-mail from client	.1
9/27/2022	e-mail to Le	.1
9/29/2022	telephone call from McKinley	.1
9/29/2022	e-mail from McKinley	.1
9/30/2022	telephone call to McKinley	.6

10/2/2024	telephone conference call with the Court	.7
10/6/2022	e-mail from client	.1
10/6/2022	e-mail from McKinley	.1
10/8/2022	e-mail from client	.1
10/11/2022	e-mail from McKinley	.1
10/11/2022	telephone call to McKinley	.4
10/11/2022	telephone conference with the Court	.3
10/12/2022	read and reviewed order from Court re page limit on MSJ	.1
10/12/022	telephone call to client	.2
10/13/2022	e-mail from McKinley	.1
10/13/2022	e-mail from McKinley	.1
10/13/2022	e-mail from McKinley	.1
10/13/2022	e-mail to McKinley	.1
10/13/2022	e-mail to McKinley	.1
10/13/2022	e-mail from McKinley	.1
10/13/2022	e-mail from McKinley	.1
10/13/2022	e-mail from McKinley	.1
10/13/2022	e-mail from McKinley	.1
10/13/2022	e-mail from McKinley	.1
10/13/2022	drafting motion for summary judgment on 1 <sup>st</sup> amendment claim	4.8
10/14/2022	e-mail from McKinley	.1
10/14/2022	e-mail to McKinley	.1
10/14/2022	e-mail from McKinley	.1
10/14/2022	e-mail to McKinley	.1
10/14/2022	e-mail from McKinley	.1
10/14/2022	e-mail to McKinley	.1
10/14/2022	e-mail from McKinley	.1
10/14/2022	telephone call from McKinley	.2



Subtotal	5.5
----------	-----

**Review of Defendants' Motion for Summary Judgment and Decision on Motion to Strike**

10/15/2022	read and reviewed Defendants' Motion for summary judgment	.1
10/15/2022	telephone call to McKinley	.4
10/17/2022	telephone call to client	.4
10/17/2022	e-mail to client	.1
10/17/2022	e-mail to McKinley	.1
10/17/2022	e-mail from McKinley	.1
10/17/2022	e-mail to McKinley	.1
10/17/2022	e-mail from McKinley	.1
10/17/2022	e-mail from McKinley	.1
10/18/2022	e-mail to client	.1
10/18/2022	telephone call from McKinley	.2
10/18/2022	read and reviewed order granting plaintiff's motion to file amended brief regarding MSJ	.1
10/18/2022	e-mail from McKinley	.1
10/18/2022	telephone call to McKinley	.4
10/18/2022	e-mail from McKinley	.1
10/19/2022	e-mail from McKinley	.1
10/19/2022	telephone call from McKinley	.2
10/19/2022	e-mail from McKinley	.1
10/19/2022	telephone call to McKinley	.3
10/20/2022	read and reviewed defendants' Motion for file an amended motion for summary judgment	.1
10/20/2022	telephone call from McKinley	.3
10/21/2022	read and reviewed order on Defendants' motion to amend	.1
10/21/2022	read and reviewed amended motion for summary judgment	.1
10/21/2022	read and reviewed amended statement of facts	.1
10/21/2022	e-mail to McKinley	.1

10/21/2022	e-mail from McKinley	.1
10/27/2022	e-mail from McKinley	.1
10/28/2022	read and reviewed entry of appearance by Bradford	.1
10/31/2022	telephone call from McKinley	.6
11/1/2022	e-mail from McKinley	.1
11/2/2022	e-mail from McKinley	.1
11/2/2022	drafting brief in support of motion to strike Defendants' MSJ	3.5
11/2/2022	telephone call to McKinley	.5
11/3/2022	telephone call from McKinley	.3
11/3/2022	e-mail to McKinley	.1
11/3/2022	e-mail from McKinley	.1
11/3/2022	e-mail from client	.1
11/3/2022	e-mail from McKinley	.1
11/3/2022	e-mail from McKinley	.1
11/7/2022	e-mail from Emily Hoff	.1
11/7/2022	e-mail to Emily Hoff	.1
11/7/2022	e-mail from Medina	.1
11/7/2022	e-mail from Emily Hoff	.1
11/7/2022	e-mail from Medina	.1
11/7/2022	e-mail to Medina	.1
11/7/2022	e-mail from Medina	.1
11/7/2022	e-mail from McKinley	.1
11/7/2022	e-mail to Hoff	.1
11/7/2022	e-mail from Hoff	.1
11/7/2022	read and reviewed withdrawal of appearance by Le	.1
11/8/2022	e-mail from Medina	.1
11/8/2022	e-mail to Medina	.1
11/8/2022	e-mail from Medina	.1
11/8/2022	e-mail from Medina	.1

11/8/2022	e-mail from Hoff	.1
11/8/2022	e-mail from McKinley	.1
11/8/2022	e-mail from McKinley	.1
11/8/2022	e-mail to McKinley	.1
11/8/2022	e-mail from McKinley	.1
11/8/2022	e-mail to McKinley	.1
11/8/2022	e-mail from McKinley	.1
11/8/2022	telephone call to client	.1
11/8/2022	telephone call to McKinley	.8
11/10/2022	conference with Mag. Lloret	.1
11/10/2022	telephone call from McKinley	.1
11/11/2022	telephone call from McKinley	.3
11/15/2022	telephone call from McKinley	.2
11/16/2022	read and reviewed Defendants' response to motion to strike MSJ	.1
11/17/2022	drafting reply brief re Pl. Motion to Strike MSJ	.1
11/22/2022	e-mail to McKinley	.1
11/22/2022	e-mail from McKinley	.1
11/22/2022	e-mail from McKinley	.1
12/4/2022	e-mail from Mensing	.1
12/4/2022	e-mail to client	.1
12/5/2022	e-mail from McKinley	.1

---

Subtotal		14.5
----------	--	------

**On-going access issues**

12/21/2022	e-mail from client	.1
12/21/2022	e-mail from Gardner	.1
12/21/2022	e-mail from McKinley	.1
12/21/2022	e-mail to client	.1
12/21/2022	telephone call to client	.2

12/21/2022	e-mail from McKinley	.1
1/25/2023	drafting notice of change of address	.1
2/10/2023	e-mail from Medina	.1
2/10/2023	e-mail to McKinley	.1
2/10/2023	e-mail from McKinley	.1
2/10/2023	e-mail from McKinley	.1
4/16/2023	e-mail from client	.1
4/16/2023	e-mail to client	.1
4/16/2023	e-mail from McKinley	.1
<hr/>		
Subtotal		1.5
<b>Mediation</b>		
5/2/2023	e-mail from McCurry	.1
5/2/2023	e-mail from McKinley	.1
5/2/2023	e-mail from Bradford	.1
5/3/2023	telephone call to McKinley	.3
5/4/2023	conference with Magistrate Lloret	.2
5/4/2023	telephone call from McKinley	.1
<hr/>		
Subtotal		.9
<b>Evaluation of MSJ decisions and motion for partial reconsideration</b>		
7/25/2023	read and reviewed opinion and order granting in part and denying in part plaintiff's MSJ	.1
7/25/2023	telephone call to McKinley	.2
7/25/2023	read and reviewed order denying plaintiff's motion to strike	.1
7/25/2023	e-mail from McKinley	.1
7/25/2023	e-mail to McKinley	.1
7/25/2023	e-mail from McKinley	.1
7/25/2023	e-mail to McKinley	.1

7/26/2023	telephone call from McKinley	.5
7/26/2023	e-mail to McKinley	.1
7/26/2023	e-mail from McKinley	.1
7/31/2023	examining legal authority on whether Court can sua sponte grant MSJ on basis not argued by a party	.3
7/31/2023	e-mail to McKinley	.1
7/31/2023	examining legal authority on whether Court can sua sponte grant MSJ on basis not argued by a party	.2
7/31/2023	e-mail to McKinley	.1
7/31/2023	e-mail to McKinley	.1
7/31/2023	e-mail from McKinley	.1
7/31/2023	e-mail to McKinley	.1
8/1/2023	e-mail from McKinley	.1
8/1/2023	e-mail to McKinley	.1
8/1/2023	e-mail from McKinley	.1
8/1/2023	e-mail to McKinley	.1
8/2/2023	drafting memo in support of motion for reconsideration re 1 <sup>st</sup> Amendment claims	.5
8/4/2023	e-mail from McKinley	.1
8/4/2023	e-mail to McKinley	.1
8/4/2023	telephone call to McKinley	.2
8/4/2023	drafting brief in support of motion for reconsideration re 1 <sup>st</sup> Amendment claims	3.5
8/4/2023	telephone call from McKinley	.2
8/4/2023	e-mail to McKinley	.1
8/4/2023	e-mail from McKinley	.1
8/5/2023	revising damages portion of motion for reconsideration	.2
8/5/2023	e-mail to McKinley	.1
8/5/2023	revising draft of reconsideration brief re 1 <sup>st</sup> amendment claims	.2

8/5/2023	e-mail to McKinley	.1
8/6/2023	e-mail from McKinley	.1
8/6/2023	e-mail to McKinley	.1
8/6/2023	examining legal authority re the comparison of tort claims to Discrimination claims	.2

---

Subtotal		4.3
----------	--	-----

**Mediation**

8/9/2023	read and reviewed order setting status conference	.1
8/14/2023	e-mail from McKinley	.1
8/15/2023	e-mail to McKinley	.1
8/15/2023	e-mail from McKinley	.1
8/15/2023	e-mail to McKinley	.1
8/16/2023	telephone call from McKinley	.2
8/16/2023	e-mail from McKinley	.1
8/16/2023	telephone conference with Magistrate Lloret's staff	.2
8/16/2023	e-mail from Skolnik	.1
8/16/2023	telephone call from McKinley	.3
8/16/2023	e-mail from Skolnik	.1
8/18/2023	e-mail from client	.1
8/22/2023	e-mail from client	.1
8/22/2023	e-mail from McKinley	.1
8/22/2023	e-mail to McKinley	.1
8/22/2023	e-mail from Skolnik	.1
8/23/2023	telephone call to McKinley	.2
8/23/2023	telephone call to client	.1

---

Subtotal		2.3
----------	--	-----

**Post briefing work on motion for reconsideration**

9/12/2023	read and reviewed defendant's response to plaintiff's motion for reconsideration	.1
9/14/2023	e-mail to client	.1
9/19/2023	telephone call from McKinley	.2
9/19/2023	e-mail from McKinley	.1

---

Subtotal		.5
----------	--	----

**Mediation**

1/8/2024	read and reviewed opinion on plaintiff's motion for reconsideration	.1
1/8/2024	e-mail to McKinley	.1
1/9/2024	e-mail from McKinley	.1
1/9/2024	telephone call from McKinley	.1
1/11/2024	e-mail from McCurry	.1
1/11/2024	e-mail from Bradford	.1
1/12/2024	e-mail from McCurry	.1
1/12/2024	e-mail from McKinley	.1
1/12/2024	e-mail to McCurry	.1
1/18/2024	read and reviewed order setting status conference	.1
1/18/2024	e-mail from McKinley	.1
1/18/2024	e-mail from McKinley	.1
1/19/2024	e-mail from McKinley	.1
1/19/2024	e-mail to McKinley	.1
1/19/2024	telephone call to McKinley	.2
1/19/2024	e-mail from Bradford	.1
1/19/2024	read and reviewed order setting case for conference with Lloret	.1
1/22/2024	conference call with the Court	.3
1/22/2024	telephone call from McKinley	.2
1/22/2024	read and reviewed order setting trial date	.1

1/25/2024	telephone call from McKinley	.2
1/25/2024	conference with mag. Lloret	.1
1/25/2024	conference with mag. Lloret	.2
2/7/2024	e-mail from McKinley	.1
2/7/2024	e-mail to Mensing	.1
2/7/2024	e-mail to McKinley	.1
2/7/2024	e-mail from McKinley	.1
2/8/2024	telephone call from McKinley	.2
3/6/2024	telephone call from McKinley	.3
3/8/2024	e-mail from Bradford	.1
3/13/2024	e-mail to McKinley	.1
3/13/2024	e-mail from McKinley	.1
3/13/2024	e-mail from McKinley	.1
3/13/2024	e-mail to McKinley	.1
3/15/2024	telephone call from McKinley	.1
3/20/2024	read and reviewed order for status conference	.1
3/22/2024	telephone call from McKinley	.3
3/22/2024	examining legal authority on issue of whether ADA retaliation claims may receive emotional distress or punitive damages	.5
3/22/2024	e-mail to McKinley	.1
3/26/2024	e-mail from McKinley	.1
3/27/2024	e-mail from McKinley	.1
3/27/2024	telephone call from McKinley	.4
3/27/2024	telephone conference call to client	.9
3/28/2024	telephone call from McKinley	.2
3/28/2024	e-mail from Bradford	.1
3/28/2024	e-mail from McKinley	.1
3/28/2024	e-mail from McKinley	.1
3/28/2024	e-mail to McKinley	.1



3/28/2024	e-mail from McKinley	.1
3/28/2024	telephone call to Bradford	.2
3/28/2024	telephone call to McKinley	.1
3/28/2024	revising stipulated dismissal	.2
3/28/2024	e-mail to McKinley	.1
3/28/2024	e-mail from McKinley	.1
3/28/2024	revising the stipulated dismissal	.1
3/28/2024	e-mail to McKinley	.1
3/28/2024	e-mail from Bradford	.1
3/28/2024	e-mail to Bradford	.1
3/28/2024	e-mail from McKinley	.1
4/1/2024	e-mail from Bradford	.1
4/1/2024	e-mail from McKinley	.1
4/11/2024	telephone call from McKinley	.1
4/11/2024	telephone call with Mag. Lloret	.2
4/11/2024	telephone call with McKinley	.1
4/11/2024	read and reviewed order	.1
4/22/2024	e-mail from McKinley	.1
4/23/2024	e-mail from Bradford	.1
4/24/2024	telephone call to Marc Weinstein re fee petition	.1
4/29/2024	read and reviewed order re KU providing back pay information	.1

---

Subtotal	9.4
----------	-----

**Economic Issues**

5/10/2024	e-mail from Bradford	.1
5/15/2024	e-mail from McKinley	.1
5/15/2024	telephone call from McKinley	.1
5/16/2024	e-mail from Bradford	.1
6/5/2024	telephone call to Mckinley	.1

6/5/2024	read and reviewed order setting date for submitting status report	.1
6/6/2024	read and reviewed order transferring case to Mag. Straw	.1
6/10/2024	e-mail from Croce re schedule for settlement conference before Mag. Straw	.1
6/10/2024	e-mail from McKinley	.1
6/11/2024	e-mail to McKinley	.1
6/11/2024	e-mail from Skolnik	.1
6/11/2024	e-mail from McKinley	.1
6/11/2024	e-mail from McKinley	.1
6/11/2024	e-mail from client	.1
6/11/2024	e-mail from McKinley	.1
6/11/2024	e-mail from McKinley	.1
6/11/2024	e-mail from client	.1
6/11/2024	e-mail from McKinley	.1
6/11/2024	e-mail from client	.1
6/11/2024	e-mail from McKinley	.1
6/12/2024	e-mail from Skolnik	.1
6/12/2024	e-mail from McKinley	.1
6/12/2024	e-mail from McKinley	.1
6/12/2024	e-mail from McKinley	.1
6/12/2024	e-mail from client	.1
6/12/2024	e-mail from client	.1
6/13/2024	e-mail from Skolnik	.1
6/13/2024	e-mail from McKinley	.1
6/13/2024	e-mail from McKinley	.1
6/13/2024	e-mail from McKinley	.1
6/13/2024	e-mail to Weinstein re fee affidavit	.1
6/13/2024	e-mail from Weinstein re fee affidavit	.1
6/13/2024	e-mail to Weinstein re fee affidavit	.1
6/13/2024	e-mail to Scott Pollins re fee affidavit	.1

6/13/2024	e-mail from Scott Pollins re fee affidavit	.1
6/13/2024	e-mail to Scott Pollins re fee affidavit	.1
6/13/2024	e-mail from Skolnik	.1
6/13/2024	e-mail from Croce	.1
6/13/2024	e-mail from McKinley	.1
6/13/2024	e-mail from Croce	.1
6/13/2024	e-mail from McKinley	.1
6/13/2024	e-mail from McKinley	.1
6/13/2024	e-mail to McKinley	.1
6/13/2024	e-mail from McKinley	.1
6/13/2024	e-mail to McKinley	.1
6/13/2024	e-mail from McKinley	.1
6/13/2024	e-mail from McKinley	.1
6/13/2024	e-mail to McKinley	.1
6/14/2024	e-mail to Weinstein re fee affidavit	.1
6/14/2024	e-mail to Weinstein re fee affidavit	.1
6/14/2024	e-mail to Scott Pollins re fee affidavit	.1
6/18/2024	e-mail from McKinley	.1
6/18/2024	e-mail from Bradford	.1
6/18/2024	e-mail from McKinley	.1
6/19/2024	telephone call to McKinley	.5
6/19/2024	e-mail from McKinley	.1
7/1/2024	e-mail from McKinley	.1
7/1/2024	e-mail from McKinley	.1
7/2/2024	e-mail from McKinley	.1
7/2/2024	e-mail from Skolnik	.1
7/2/2024	e-mail from McKinley	.1
7/2/2024	e-mail from McKinley	.1
7/2/2024	e-mail from Skolnik	.1

7/2/2024	e-mail from McKinley	.1
7/2/2024	e-mail from Skolnik	.1
7/3/2024	e-mail from Skolnik	.1
7/3/2024	e-mail from McKinley	.1
7/3/2024	e-mail from Skolnik	.1
7/3/2024	e-mail from McKinley	.1
7/3/2024	e-mail from Skolnik	.1
7/3/2024	e-mail from McKinley	.1
7/3/2024	e-mail from McKinley	.1
7/3/2024	e-mail from Skolnik	.1
7/3/2024	e-mail from Bradford	.1
7/3/2024	e-mail from McKinley	.1
7/8/2024	e-mail from Skolnik	.1
7/8/2024	e-mail from Skolnik	.1

---

Subtotal		8.1
----------	--	-----

**Motion for Final Oder**

8/6/2024	e-mail from McKinley	.1
8/8/2024	e-mail to McKinley	.1
8/8/2024	telephone call from McKinley	.6
8/8/2024	e-mail to McKinley	.1
8/14/2024	e-mail from McKinley	.1
8/14/2024	e-mail from McKinley	.1
8/16/2024	e-mail to McKinley	.1
8/23/2024	e-mail to McKinley	.1
8/23/2024	e-mail from McKinley	.1
8/23/2024	e-mail from McKinley	.1
8/27/2024	e-mail from McKinley	.1
8/29/2024	e-mail from McKinley	.1

9/7/2024	e-mail from McKinley	.1
9/8/2024	e-mail to McKinley	.1
9/10/2024	e-mail from McKinley	.1
9/10/2024	e-mail to McKinley	.1
9/10/2024	telephone call from McKinley	.2
9/10/2024	e-mail from McKinley	.1
9/13/2024	e-mail from McKinley	.1
9/13/2024	e-mail from Bradford	.1
9/16/2024	e-mail from McKinley	.1
9/17/2024	e-mail from Bradford	.1
9/19/2024	e-mail from McKinley	.1
9/19/2024	e-mail from client	.1
9/19/2024	e-mail from McKinley	.1
9/23/2024	e-mail from Skolnik	.1
9/23/2024	e-mail from Skolnik	.1
9/27/2024	read and reviewed order for telephonic conference	.1
9/30/2024	e-mail from McKinley	.1
9/30/2024	e-mail from client	.1
10/2/2024	telephone call from McKinley	.2
10/2/2024	e-mail from McKinley	.1
10/4/2024	read and reviewed order extending deadlines for defendants to respond to plaintiff's motion for final order	.1
10/11/2024	e-mail from Skolnik	.1
10/11/2024	read and reviewed order extending deadlines for defendants to respond to plaintiff's motion for final order	.1
10/18/2024	read and reviewed defendants' opposition to plaintiff's motion for final Order	.1
10/24/2024	telephone call to McKinley	.4
10/24/2024	drafting section of reply brief dealing with statements made at	

	recent Board of Governors meeting	.2
10/24/2024	e-mail to McKinley	.1
11/12/2024	e-mail from McKinley	.1
11/12/2024	telephone call to McKinley	.2
12/23/2024	e-mail from McKinley	.1
1/13/2025	e-mail from McKinley	.1
1/13/2025	e-mail from client	.1
1/13/2025	e-mail from McKinley	.1
1/13/2025	e-mail from client	.1
1/21/2025	read and reviewed final order	.1

---

Subtotal	5.9
----------	-----

**Preparing Fee Petition**

1/22/2025	telephone call from McKinley	
1/23/2025	e-mail to Weinstein re fee affidavit	.1
1/23/2025	e-mail to Pollins re fee affidavit	.1
1/23/2025	e-mail from Pollins re fee affidavit	.1
1/23/2024	e-mail to McKinley	.1
1/23/2024	e-mail from McKinley	.1
1/23/2024	e-mail to McKinley	.1
1/23/2024	e-mail from McKinley	.1
1/23/2024	e-mail to McKinley	.1
1/23/2024	e-mail from McKinley	.1
1/23/2024	e-mail to McKinley	.1
1/23/2024	e-mail from McKinley	.1
1/26/2025	e-mail from Weinstein re fee affidavit	.1
1/26/2025	review of Weinstein's affidavit	.1
1/26/2025	drafting my fee affidavit	.6
1/26/2024	e-mail to McKinley	.1

1/27/2024	e-mail from McKinley	.1
1/27/2024	e-mail to McKinley	.1
1/27/2025	e-mail from Weinstein re fee affidavit	.1
1/27/2024	e-mail to McKinley	.1
1/27/2024	e-mail from McKinley	.1
1/28/2025	e-mail from McKinley	.1
1/28/2025	e-mail to McKinley	.1
1/28/2025	e-mail to McKinley	.1
1/29/2025	e-mail from McKinley	.1
1/30/2025	revising memo in support of request for attorneys' fees	.9
1/30/2025	e-mail to McKinley	.2
1/30/2025	e-mail from Pollins	.1
1/31/2025	review of time sheets	1.0
1/31/2025	revising declaration	.3
1/31/2025	e-mail to Mckinley	.1
2/1/2025	reorganizing of time sheets	.4

---

Subtotal	5.8
----------	-----

Grand Total of Hours Requested (does not include hours highlighted in yellow)	149.9
---	-------

#### Expenses

5/20/2022	Mileage to McKinley's office for meeting 150 x .585 =	\$ 87.75
8/27/2022	Mileage to McKinley's office for Focus Group 150 x .625 =	\$ 93.75
8/27/2022	lunch with Lorrie	\$ 51.77

---

Total	\$ 233.27
-------	-----------